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8
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10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 CORY HORTON, on behalf of
himself and all others similarly
13 situated,

14 Plaintiff,

15 vs.
16

17 CAVALRY PORTFOLIO
18 SERVICES, LLC,

19 Defendant.
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21 KEVIN KREJCI,

22 Plaintiff,

23 vs.
24

25 CAVALRY PORTFOLIO
26 SERVICES, LLC,

27 Defendant.
28

CASE NO. 13-CV-00307-JAH-WVG

**JOINT MOTION TO EXTEND TIME
TO FILE A MOTION FOR
PRELIMINARY APPROVAL**

Honorable John A. Houston

CASE NO. 3:16-CV-00211-JAH-WVG

**JOINT MOTION TO EXTEND TIME
TO FILE A MOTION FOR
PRELIMINARY APPROVAL**

Honorable John A. Houston

Pursuant to the Court's Order (ECF Docket 283) to file a timely Motion for Preliminary Approval by January 31, 2020, plaintiff Cory Horton and plaintiff Kevin Krejci (hereinafter "Plaintiffs") and defendant Calvary Portfolio Services, LLC ("Defendant") respectfully request that the Court grant their Joint Motion to Extend the time for both parties to file a Motion for Preliminary Approval from the current deadline January 31, 2020 to February 21, 2020.

Good cause exists for the brief extension. Counsel for both parties have been in constant communication over the past weeks regarding the confirmatory discovery contemplated by the settlement, and interrogatory responses have been provided. In addition, a deposition of a Cavalry representative is now set for January 24, 2020. The parties have also been exchanging drafts and revisions of the Settlement Agreement and related exhibits. Despite their best efforts, the parties do not believe they will be in a position to file the Motion for Preliminary Approval on the current deadline. Accordingly, Plaintiffs and Defendant respectfully and jointly request an extension to file the Motion for Preliminary Approval to February 21, 2020.

DATED: January 23, 2020

Respectfully Submitted,

/s/ Tomio B. Narita

By: _____
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